

Of Counsel:

BAYS LUNG ROSE & HOLMA

KARIN L. HOLMA 5207-0

Attorney at Law

A Law Corporation

DAVID R. MAJOR 9194-0

Attorney at Law

A Law Corporation

JAMES G. DIEHL 10637-0

Topa Financial Center

700 Bishop Street, Suite 900

Honolulu, Hawaii 96813

Telephone: (808) 523-9000

Attorneys for Defendants

MT TERRACE ASSOCIATION OF

APARTMENT OWNERS, An Unincorporated

Association and TOUCHSTONE PROPERTIES,

LTD., A Domestic Profit Corporation

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JAMES H. HALL,) CASE NO. 1:16-cv-00552 JMS-KSC

Plaintiff,) DEFENDANTS' FIRST REQUEST

vs.) FOR ADMISSIONS TO PLAINTIFF

JAMES H. HALL

MT TERRACE AOA [Association of)

Apartment Owners], An)

Unincorporated Association and)

TOUCHSTONE PROPERTIES, LTD.,)

A Domestic Profit Corporation And the)

Unknown Doe Defendants,)

No trial date set.

Defendants.)

DEFENDANTS' FIRST REQUEST FOR
ADMISSIONS TO PLAINTIFF JAMES H. HALL

TO: JAMES H. HALL
P.O. Box 26085
Honolulu, HI 96825

Plaintiff, *Pro Se*

IT IS REQUESTED that Plaintiff James H. Hall ("Plaintiff") make the admissions enumerated herein in accordance with Rule 36 of the Federal Rules of Civil Procedure, within thirty (30) days after service of this request. If Plaintiff fails to respond within that period, the items will be deemed admitted pursuant to the Rule.

In answering this Request for Admissions, Plaintiff is required to perform a reasonable inquiry into the substance of each request for admission.

DATED: Honolulu, Hawaii, January 13, 2017.

KARIN L. HOLMA
DAVID R. MAJOR
JAMES G. DIEHL

Attorneys for Defendants
MT TERRACE ASSOCIATION OF
APARTMENT OWNERS, An
Unincorporated Association and
TOUCHSTONE PROPERTIES, LTD., A
Domestic Profit Corporation

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions are applicable to this Request:

1. “You,” “Your,” or “Plaintiff” means and includes Plaintiff James H. Hall, and all other persons or entities acting or purporting to act on his behalf, including, without limitation, his present and former agents, employees, consultants, investigators, attorneys and former attorneys, insurance carriers, accountants, and advisors.
2. The term “AOAO” means and includes Defendant MT TERRACE ASSOCIATION OF APARTMENT OWNERS, An Unincorporated Association and TOUCHSTONE PROPERTIES, LTD., A Domestic Profit Corporation, and all other persons or entities acting or purporting to act on its behalf, including, without limitation, its present and former agents, employees, consultants, investigators, attorneys and former attorneys, insurance carriers, accountants, and advisors.
3. The term “Lawsuit” means the action initiated by Plaintiff entitled JAMES H. HALL, v. MT TERRACE AOAO [Association of Apartment Owners], An Unincorporated Association, et al., Civil No. 1:16-cv-00552 JMS-KSC, including, but not limited to, any proceedings related thereto.

4. The term “Complaint” means the Complaint filed by Plaintiff

James H. Hall on October 11, 2016 as Civil No. 1:16-cv-00552 JMS-KSC.

REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1: You were an employee of the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 2: You were employed by the AOA as maintenance personnel.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 3: You were hired by the AOA in February 2013.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 4: You were terminated by the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 5: You were terminated by the AOA in June 2015.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 6: Attached hereto as Exhibit 1 is a true and correct copy of the Personnel Procedure Manual for Mt. Terrace Association of Apartment Owners (01001001-01001026, the "Personnel Procedure Manual").

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 7: The purpose of the Personnel Procedure Manual is to set forth the general framework of employment at the AOA and answer questions that employees may have about their work.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 8: The Personnel Procedure Manual sets forth the rules of conduct to be followed by all employees of the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 9: The Personnel Procedure Manual sets forth inappropriate work conduct that may result in the termination of employees.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 10: The Personnel Procedure Manual was in effect during your employment at the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 11: You received a copy of the Personnel Procedure Manual prior to your employment at the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 12: You received a copy of the Personnel Procedure Manual during your employment at the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 13: The Personnel Procedure Manual states that the employment relationship for all employees of the AOA is at-will.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 14: The Personnel Procedure Manual states that employees receive one, thirty (30) minute meal break per shift, as scheduled by management.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 15: The Personnel Procedure Manual requires employees to be prompt when reporting for work.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 16: The Personnel Procedure Manual requires that if employees anticipate being late, they must notify the Manager as to why they were late.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 17: The Personnel Procedure Manual identifies unexcused or excessive tardiness or absenteeism as unacceptable conduct that may lead to termination.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 18: The Personnel Procedure Manual identifies sleeping or loafing on the job as unacceptable conduct that may lead to termination.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 19: The Personnel Procedure Manual identifies use of profane or abusive language toward any employee or resident at the AOA as unacceptable conduct that may lead to termination.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 20: The Personnel Procedure Manual identifies being discourteous or undignified to residents, tenants, or guests at the AOA as unacceptable conduct that may lead to termination.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 21: The Personnel Procedure Manual identifies insubordination as unacceptable conduct that may lead to termination.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 22: The Personnel Procedure Manual requires that employees be courteous and respectful at all times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 23: Attached hereto as Exhibit 2 (01001128) is a true and correct copy of the Acknowledgement Form.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 24: You received a copy of the Acknowledgment Form prior to your employment at the AOA as part of the Personnel Procedure Manual attached hereto as Exhibit 1.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 25: You received a copy of the Acknowledgment Form during your employment at the AOA as part of the Personnel Procedure Manual attached hereto as Exhibit 1.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 26: You have reviewed the Personnel Procedure Manual attached hereto as Exhibit 1.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 27: You have reviewed the Acknowledgment Form attached hereto as Exhibit 2.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 28: You understand the guidelines and procedures contained in the Personnel Procedure Manual.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 29: You signed a copy of the Acknowledgment Form.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 30: The signature on the Acknowledgment Form attached here to as Exhibit 2 is your signature.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 31: By signing the Acknowledgement Form you acknowledged receipt of the Personnel Procedure Manual.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 32: By signing the Acknowledgement Form you acknowledged that you had read the Personnel Procedure Manual.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 33: By signing the Acknowledgement Form you acknowledged that you understood the guidelines and procedures contained in the Personnel Procedure Manual.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 34: Attached hereto as Exhibit 3 is a true and correct copy of the policy regarding use of cell phone, smart phone, and other electronic devices (01001027, the "Cell Phone Policy").

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 35: You received a copy of the Cell Phone Policy during your employment at the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 36: You reviewed a copy of the Cell Phone Policy during your employment at the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 37: You understood the content of the Cell Phone Policy at the time that you reviewed it.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 38: The Cell Phone Policy states that use of electronic devices such as cell phones and smart phones at work is inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 39: The Cell Phone Policy advised all employees to curb their use of electronic devices such as cell phones and smart phones at work.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 40: While employed at the AOA and during work hours, you used a cellular phone, smart phone, or other electronic device.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 41: While employed at the AOA you received at least one warning regarding your use of cellular phones, smart phones, or other electronic devices while working.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 42: While employed at the AOA you received at least two warnings regarding your use of cellular phones, smart phones, or other electronic devices while working.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 43: While employed at the AOA you received at least three warnings regarding your use of cellular phones, smart phones, or other electronic devices while working.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 44: While employed at the AOAO you received at least four warnings regarding your use of cellular phones, smart phones, or other electronic devices while working.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 45: While employed at the AOAO you received at least five warnings regarding your use of cellular phones, smart phones, or other electronic devices while working.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 46: While employed at the AOAO you received more than five warnings regarding your use of cellular phones, smart phones, or other electronic devices while working.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 47: While employed at the AOAO you took at least one meal break that lasted for more than thirty (30) minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 48: While employed at the AOAO you took at least two meal breaks that lasted for more than thirty (30) minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 49: While employed at the AOAO you took at least three meal breaks that lasted for more than thirty (30) minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 50: While employed at the AOAO you took at least four meal breaks that lasted for more than thirty (30) minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 51: While employed at the AOAO you took at least five meal breaks that lasted for more than thirty (30) minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 52: While employed at the AOAO you took more than five meal breaks that lasted for more than thirty (30) minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 53: While employed at the AOAO you were warned that taking meal breaks for more than thirty (30) minutes was inappropriate work conduct at least one time.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 54: While employed at the AOAO you were warned that taking meal breaks for more than thirty (30) minutes was inappropriate work conduct at least two times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 55: While employed at the AOAO you were warned that taking meal breaks for more than thirty (30) minutes was inappropriate work conduct at least three times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 56: While employed at the AOAO you were warned that taking meal breaks for more than thirty (30) minutes was inappropriate work conduct at least four times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 57: While employed at the AOA you were warned that taking meal breaks for more than thirty (30) minutes was inappropriate work conduct at least five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 58: While employed at the AOA you were warned that taking meal breaks for more than thirty (30) minutes was inappropriate work conduct more than five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 59: While employed at the AOA and during work hours, you slept at least one time.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 60: While employed at the AOA and during work hours, you slept at least two times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 61: While employed at the AOA and during work hours, you slept at least three times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 62: While employed at the AOA and during work hours, you slept at least four times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 63: While employed at the AOA and during work hours, you slept at least five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 64: While employed at the AOA and during work hours, you slept more than five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 65: While employed at the AOA you were warned at least one time that sleeping while on duty was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 66: While employed at the AOA you were warned at least two times that sleeping while on duty was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 67: While employed at the AOA you were warned at least three times that sleeping while on duty was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 68: While employed at the AOA you were warned at least four times that sleeping while on duty was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 69: While employed at the AOA you were warned at least five times that sleeping while on duty was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 70: While employed at the AOA you were warned more than five times that sleeping while on duty was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 71: While employed at the AOAO you arrived late for your scheduled work shift at least one time.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 72: While employed at the AOAO you arrived late for your scheduled work shift at least two times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 73: While employed at the AOAO you arrived late for your scheduled work shift at least three times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 74: While employed at the AOAO you arrived late for your scheduled work shift at least four times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 75: While employed at the AOAO you arrived late for your scheduled work shift at least five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 76: While employed at the AOAO you arrived late for your scheduled work shift more than five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 77: While employed at the AOAO you were warned at least one time that arriving late for your scheduled work shifts was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 78: While employed at the AOAO you were warned at least two times that arriving late for your scheduled work shifts was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 79: While employed at the AOAO you were warned at least three times that arriving late for your scheduled work shifts was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 80: While employed at the AOAO you were warned at least four times that arriving late for your scheduled work shifts was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 81: While employed at the AOAO you were warned at least five times that arriving late for your scheduled work shifts was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 82: While employed at the AOAO you were warned more than five times that arriving late for your scheduled work shifts was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 83: While employed at the AOAO you were insubordinate at least one time.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 84: While employed at the AOA you were insubordinate at least two times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 85: While employed at the AOA you were insubordinate at least three times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 86: While employed at the AOA you were insubordinate at least four times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 87: While employed at the AOA you were insubordinate at least five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 88: While employed at the AOA you were insubordinate more than five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 89: While employed at the AOA you were warned at least one time that your insubordination was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 90: While employed at the AOA you were warned at least two times that your insubordination was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 91: While employed at the AOA you were warned at least three times that your insubordination was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 92: While employed at the AOA you were warned at least four times that your insubordination was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 93: While employed at the AOA you were warned at least five times that your insubordination was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 94: While employed at the AOA you were warned more than times that your insubordination was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 95: While employed at the AOA you failed to timely complete your assigned tasks at least one time.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 96: While employed at the AOA you failed to timely complete your assigned tasks at least two times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 97: While employed at the AOA you failed to timely complete your assigned tasks at least three times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 98: While employed at the AOA you failed to timely complete your assigned tasks at least four times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 99: While employed at the AOAO you failed to timely complete your assigned tasks at least five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 100: While employed at the AOAO you failed to timely complete your assigned tasks more than five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 101: While employed at the AOAO you were warned at least one time that your failure to timely complete assigned tasks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 102: While employed at the AOAO you were warned at least two times that your failure to timely complete assigned tasks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 103: While employed at the AOA you were warned at least three times that your failure to timely complete assigned tasks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 104: While employed at the AOA you were warned at least four times that your failure to timely complete assigned tasks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 105: While employed at the AOA you were warned at least five times that your failure to timely complete assigned tasks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 106: While employed at the AOA you were warned more than six times that your failure to timely complete assigned tasks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 107: While employed at the AOA you left work before the end of your scheduled work shift at least one time.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 108: While employed at the AOA you left work before the end of your scheduled work shift at least two times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 109: While employed at the AOA you left work before the end of your scheduled work shift at least three times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 110: While employed at the AOA you left work before the end of your scheduled work shift at least four times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 111: While employed at the AOA you left work before the end of your scheduled work shift at least five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 112: While employed at the AOAO you left work before the end of your scheduled work shift more than five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 113: While employed at the AOAO you were warned at least one time that leaving work before the end of your scheduled work shift was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 114: While employed at the AOAO you were warned at least two times that leaving work before the end of your scheduled work shift was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 115: While employed at the AOAO you were warned at least three times that leaving work before the end of your scheduled work shift was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 116: While employed at the AOA you were warned at least four times that leaving work before the end of your scheduled work shift was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 117: While employed at the AOA you were warned at least five times that leaving work before the end of your scheduled work shift was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 118: While employed at the AOA you were warned more than five times that leaving work before the end of your scheduled work shift was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 119: While employed at the AOA and during work hours, you took an unscheduled break at least one time.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 120: While employed at the AOA and during work hours, you took an unscheduled break at least two times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 121: While employed at the AOA and during work hours, you took an unscheduled break at least three times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 122: While employed at the AOA and during work hours, you took an unscheduled break at least four times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 123: While employed at the AOA and during work hours, you took an unscheduled break at least five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 124: While employed at the AOA and during work hours, you took an unscheduled break more than five times.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 125: While employed at the AOA you were warned at least one time that taking unscheduled breaks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 126: While employed at the AOA you were warned at least two times that taking unscheduled breaks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 127: While employed at the AOA you were warned at least three times that taking unscheduled breaks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 128: While employed at the AOA you were warned at least four times that taking unscheduled breaks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 129: While employed at the AOA you were warned at least five times that taking unscheduled breaks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 130: While employed at the AOA you were warned more than six times that taking unscheduled breaks was inappropriate conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 131: Attached hereto as Exhibit 4 is a true and correct copy of the Employee Performance Evaluation (01001131-01001134, the "Performance Evaluation").

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 132: The document attached hereto as Exhibit 4 is part of the AOA's business records.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 133: The document attached hereto as Exhibit 4 was made, collected, and/or maintained, at or near the time of the occurrence of the matters set forth therein, be a person with knowledge of such matters (or from information transmitted by a person with such knowledge).

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 134: The document attached hereto as Exhibit 4 was made, collected, and/or maintained in the course of regularly conducted activity, and a regular practice.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 135: You signed a copy of the Performance Evaluation.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 136: The signature on the Performance Evaluation at 01001134, above the line marked "Employee's Signature" is your signature.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 137: Your signature on the Performance evaluation indicates that you reviewed the content contained therein.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 138: Your signature on the Performance evaluation indicates that you understood the content contained therein.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 139: Your signature on the Performance evaluation indicates that you received a copy of the Performance Evaluation.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 140: The Performance Evaluation is intended to evaluate the performance of employees of the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 141: The Performance Evaluation identifies aspects of your performance that needed improvement or development.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 142: The Performance Evaluation at 01001133 includes supervisor's comments describing your performance.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 143: The Performance Evaluation identifies your excessive use of cell phones during work hours as an area that needed improvement or development.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 144: The Performance Evaluation identifies your excessive conversations with residents as an area that needed improvement or development.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 145: You had excessive conversations with residents while employed by the AOA and during work hours.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 146: The supervisor's comments included in the Performance Evaluation indicate that you were often distracted by personal matters while at work.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 147: While employed by the AOAO and during work hours you were often distracted from your work tasks by personal matters.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 148: The Performance Evaluation states that unless changes in your performance occurred, you would be terminated.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 149: You were aware that your work performance was unsatisfactory.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 150: You were aware that if your work performance did not improve that you would be terminated.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 151: Your work performance did not improve after receiving the Performance Evaluation.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 152: Attached hereto as Exhibit 5 is a photograph depicting two individuals in an elevator (01001130).

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 153: The photograph attached hereto as Exhibit 5 depicts you.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 154: The photograph attached hereto as Exhibit 5 depicts you sitting.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 155: The photograph attached hereto as Exhibit 5 depicts you sitting while employed at the AOA and during work hours.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 156: The photograph attached hereto as Exhibit 5 was taken on or about June 12, 2015.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 157: The photograph attached hereto as Exhibit 5 accurately depicts the events on June 12, 2015.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 158: Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the site manager's hand written log (01001046 - 01001110, the "Site Manager's Log").

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 159: The document attached hereto as Exhibit 6 is part of the AOA's business records.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 160: The document attached hereto as Exhibit 6 was made, collected, and/or maintained, at or near the time of the occurrence of the matters set forth therein, by a person with knowledge of such matters (or from information transmitted by a person with such knowledge).

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 161: The documents attached hereto as Exhibit 6 was made, collected, and/or maintained in the course of regularly conducted activity, and a regular practice.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 162: The Site Manager's Log attached hereto as Exhibit 6 is used by site manager to record daily events and/or occurrences related to the AOA.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 163: The Site Manager's Log indicates that on August 19, 2013, you left before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 164: On August 19, 2013, you left before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 165: During your employment at the AOA, you were required to remain at work until the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 166: The Site Manager's Log indicates that on August 21, 2013, you called the AOA to report that you would be late for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 167: On August 21, 2013, you called the AOA to report that you would be late for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 168: On August 21, 2013, you were late to your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 169: The Site Manager's Log indicates that on September 13, 2013, you left your scheduled work shift at 1:00 p.m.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 170: On September 13, 2013, you left your scheduled work shift at or around 1:00 p.m.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 171: On September 13, 2013, your work shift was not scheduled to end until sometime after 1:00 p.m.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 172: The Site Manager's Log indicates that on September 18, 2013, you left work early.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 173: On September 18, 2013, you left work early.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 174: The Site Manager's Log indicates that on October 3, 2013, you were late to arrive for you scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 175: On October 3, 2013, you were late to arrive for you scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 176: The Site Manager's Log indicates that on October 3, 2013, you left work before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 177: On October 3, 2013, you left work before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 178: The Site Manager's Log indicates that on November 21, 2013, you took a one hour meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 179: On November 21, 2013, you took a one hour meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 180: On November 21, 2013, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 181: The Site Manager's Log indicates that on November 27, 2013, you arrived late to your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 182: On November 27, 2013, you arrived late to your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 183: The Site Manager's Log indicates that on November 27, 2013, you took a forty-seven minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 184: On November 27, 2013, you took a forty-seven minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 185: On November 27, 2013, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 186: The Site Manager's Log indicates that on December 23, 2013, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 187: On December 23, 2013, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 188: The Site Manager's Log indicates that on January 6, 2014, you did not show up for your scheduled work shift due to illness.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 189: On January 6, 2014, you did not show up for your scheduled work shift due to illness.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 190: The Site Manager's Log indicates that on January 10, 2014, you left work before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 191: On January 10, 2014, you left work before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 192: The Site Manager's Log indicates that on January 29, 2014, you left work before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 193: On January 29, 2014, you left work before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 194: The Site Manager's Log indicates that on May 29, 2015, you took a seventy-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 195: On May 29, 2015, you took a seventy-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 196: On May 29, 2014, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 197: The Site Manager's Log indicates that on June 12, 2014, you took a fifty minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 198: On June 12, 2014, you took a fifty minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 199: On June 12, 2014, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 200: The Site Manager's Log indicates that on June 19, 2014, you left your scheduled work shift at 9:30 a.m.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 201: On June 19, 2014, you left your scheduled work shift at 9:30 a.m.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 202: On June 19, 2014, your work shift was scheduled to end sometime after 9:30 a.m.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 203: The Site Manager's Log indicates that on June 25, 2014, you took a forty-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 204: On June 25, 2014, you took a forty-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 205: On June 25, 2014, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 206: The Site Manager's Log indicates that on September 4, 2014, the site manager spoke with you regarding taking long lunches, tardiness, slack support, work between 3-4 p.m., cell phone use, and casual attitude.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 207: On September 4, 2014, the site manager spoke with you regarding taking long lunches, tardiness, slack support, work between 3-4 p.m., cell phone use, and casual attitude.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 208: On September 4, 2014, the site manager spoke with you regarding unsatisfactory work conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 209: On September 4, 2014, the site manager spoke with you.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 210: The Site Manager's Log indicates that on September 16, 2014, you were on meal break for a period longer than scheduled for that day.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 211: On September 16, 2014, you were on meal break for a period longer than scheduled for that day.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 212: The Site Manager's Log indicates that on October 1, 2014, the site manager spoke with you regarding performance, cell phone use and texting, frequent water breaks, long lunches, and bathroom breaks.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 213: The Site Manager's Log indicates that on October 1, 2014, the site manager warned you that you were receiving your last warning about unsatisfactory work conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 214: On October 1, 2014, the site manager spoke with you regarding performance, cell phone use and texting, frequent water breaks, long lunches, and bathroom breaks.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 215: On October 1, 2014, the site manager warned you that you were receiving your last warning about unsatisfactory work conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 216: The Site Manager's Log indicates that on December 9, 2014, you left before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 217: On December 9, 2014, you left before the end of your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 218: The Site Manager's Log indicates that on January 8, 2015, you chose not to participate in respiratory mask fitting by HCRC because you wanted to grow a beard.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 219: On January 8, 2015, you chose not to participate in respiratory mask fitting by HCRC because you wanted to grow a beard.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 220: On January 8, 2015, you chose not to participate in respiratory mask fitting by HCRC.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 221: The Site Manager's Log indicates that on January 9, 2015, you were found sleeping in 15B.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 222: On January 9, 2015, you were found sleeping in 15B.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 223: On January 9, 2015, you were sleeping in 15B.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 224: The Site Manager's Log indicates that on January 14, 2015, you did not show up for your scheduled work shift due to illness.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 225: On January 14, 2015, you did not show up for your scheduled work shift due to illness.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 226: On January 14, 2015, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 227: The Site Manager's Log indicates that on January 15, 2015, you did not show up for your scheduled work shift due to illness.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 228: On January 15, 2015, you did not show up for your scheduled work shift due to illness.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 229: On January 15, 2015, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 230: The Site Manager's Log indicates that on January 20, 2015, you arrived late for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 231: On January 20, 2015, you arrived late for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 232: The Site Manager's Log indicates that on January 21, 2015, during work hours, you changed the air pressure in the tires of your personal vehicle.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 233: On January 21, 2015, during work hours, you changed the air pressure in the tires of your personal vehicle.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 234: The Site Manager's Log indicates that on February 13, 2015, during work hours, you were resting.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 235: On February 13, 2015, during work hours, you were resting.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 236: The Site Manager's Log indicates that on February 13, 2015, during work hours, you had prolonged conversations with residents.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 237: On February 13, 2015, during work hours, you had prolonged conversations with residents.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 238: The Site Manager's Log indicates that on February 26, 2015, you interfered with other employee activities.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 239: On February 26, 2015, you interfered with other employee activities.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 240: The Site Manager's Log indicates that on March 12, 2015, you left your scheduled work shift early.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 241: On March 12, 2015, you left your scheduled work shift early.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 242: The Site Manager's Log indicates that on April 20, 2015, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 243: On April 20, 2015, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 244: The Site Manager's Log indicates that on May 20, 2015, during work hours, you spent most of the afternoon emailing and texting.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 245: On May 20, 2015, during work hours, you spent most of the afternoon emailing and texting.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 246: On May 20, 2015, you emailed and/or texted during work hours.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 247: The Site Manager's Log indicates that on May 21, 2015, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 248: On May 21, 2015, you did not show up for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 249: The Site Manager's Log indicates that on May 26, 2015, you took a forty-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 250: On May 26, 2015, you took a forty-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 251: On May 26, 2015, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 252: The Site Manager's Log indicates that on May 27, 2015, you took a seventy-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 253: On May 27, 2015, you took a seventy-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 254: On May 27, 2015, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 255: The Site Manager's Log indicates that on May 28, 2015, you took a forty-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 256: On May 28, 2015, you took a forty-five minute meal break.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 257: On May 28, 2015, your scheduled meal break was for thirty minutes.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 258: The Site Manager's Log indicates that on May 29, 2015, you arrived late for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 259: On May 29, 2015, you arrived late for your scheduled work shift.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 260: The Site Manager's Log indicates that on June 4, 2015, you had an outburst during work hours involving an altercation with another employee

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 261: On June 4, 2015, you had an outburst during work hours.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 262: The Site Manager's Log indicates that on June 5, 2015, you were terminated.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 263: On June 5, 2015, you were terminated.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 264: Your termination was the result of inappropriate work conduct.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 265: You failed to timely file Initial Disclosures in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 266: You failed to timely file a Scheduling Conference Statement in accordance with Rule 16 of the Federal Rules of Civil Procedure.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 267: You failed to timely file a Scheduling Conference Statement in accordance with Rule 16 of the Federal Rules of Civil Procedure.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 268: You did not file a Hawaii Civil Rights Commission Act Complaint.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 269: You have not suffered emotional pain as a result of the facts alleged in the Complaint.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 270: You have not suffered inconvenience as a result of the facts alleged in the Complaint.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 271: You have not suffered mental anguish as a result of the facts alleged in the Complaint.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 272: You have not suffered humiliation as a result of the facts alleged in the Complaint.

ADMIT: _____ DENY: _____

REQUEST FOR ADMISSION NO. 273: You have not suffered loss of enjoyment of life as a result of the facts alleged in the Complaint.

ADMIT: _____ DENY: _____

Of Counsel:

BAYS LUNG ROSE & HOLMA

KARIN L. HOLMA 5207-0
 Attorney at Law
 A Law Corporation
 DAVID R. MAJOR 9194-0
 JAMES G. DIEHL 10637-0
 Topa Financial Center
 700 Bishop Street, Suite 900
 Honolulu, Hawaii 96813
 Telephone: (808) 523-9000

Attorneys for Defendants
 MT TERRACE AOAO [Association of
 Apartment Owners], An Unincorporated
 Association and TOUCHSTONE PROPERTIES,
 LTD., A Domestic Profit Corporation

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF HAWAII

JAMES H. HALL,)	CASE NO. 1:16-cv-00552 JMS-KSC
)	
Plaintiff,)	CERTIFICATE OF SERVICE
vs.)	[RE: DEFENDANTS' FIRST
)	REQUEST FOR ADMISSIONS TO
MT TERRACE AOAO [Association of)	PLAINTIFF JAMES H. HALL]
Apartment Owners], An)	
Unincorporated Association and)	
TOUCHSTONE PROPERTIES, LTD.,)	
A Domestic Profit Corporation And the)	
Unknown Doe Defendants,)	No trial date set.
)	
Defendants.)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that two true and correct copies of DEFENDANTS' FIRST REQUEST FOR ADMISSIONS TO PLAINTIFF JAMES H. HALL, dated January 13, 2017, were served on the following party via U.S. Mail, postage prepaid, as indicated below:

JAMES H. HALL
P.O. Box 26085
Honolulu, HI 96825

Plaintiff, *Pro Se*

DATED: Honolulu, Hawaii, January 13, 2017.

/s/ James G. Diehl

KARIN L. HOLMA
DAVID R. MAJOR
JAMES G. DIEHL

Attorneys for Defendants
MT TERRACE ASSOCIATION OF
APARTMENT OWNERS, An
Unincorporated Association and
TOUCHSTONE PROPERTIES, LTD., A
Domestic Profit Corporation